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September 21, 2000

VIA HAND DELIVERY

Magalie Roman Salas, Esquire
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Room TW-B204
Washington, D.C. 20554

Re: WT Docket No. 00-48
RM-9499

Dear Ms. Salas:

On behalf of the Tideland Signal Corporation ("Tideland"), we are filing an original and five (5) copies of its Reply Comments in the above-referenced matter.

If there are questions, do not hesitate to call the undersigned at (703) 812-0480.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, PLC



Leonard R. Raish
Counsel for
Tideland Signal Corporation

LRR:cej
Enclosures

No. of Copies rec'd 075
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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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In the Matter of)

SEP 21 2000

Amendment of Parts 13 and 80 of the)
Commission's Rules concerning)
Maritime Communications)

WT Docket No. 00-48

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Petition for Rule Making Filed by)
Tideland Signal Corporation)

RM-9499

Federal Communications Bar Association's)
Petition for Forbearance from Section 310(d))
of the Communications Act Regarding Non-)
Substantial Assignments of Wireless Licenses)
and Transfers of Control involving)
Telecommunications Carriers)

and)

Personal Communications Industry Association's)
Broadband Personal Communications Services)
Alliance's Petition for Forbearance for Broadband)
Personal Communications Services)

REPLY COMMENTS BY TIDELAND SIGNAL CORPORATION

The Tideland Signal Corporation ("Tideland"), by its attorney and pursuant to the provisions of Section 1.415 of the Rules and Regulations of the Federal Communications Commission ("FCC" or "Commission"), hereby submits the Reply Comments below in further response to the above cited Public Notice.

As pointed out in its Comments earlier in this proceeding, Tideland is in the business of designing and manufacturing aids to marine navigation and remote lighthouse and buoy monitoring and control equipment and AIS equipment. The equipments involved are provided for both the U.S. Domestic and international maritime markets.

The interest of Tideland in this proceeding lies in making provisions in the Commission's Rules for Automatic Identification Systems (AIS). In its Comments, Tideland recommended the Commission proceed with the development of regulations for AIS to ensure AIS equipments meet IMO and USCG vessel carriage requirements.

Tideland is pleased to note the Coast Guard has included an in-depth discussion of AIS in its Comments on this proceeding.¹ Particular reference is made to the statement "The USCG requests the Commission develop the necessary regulations to ensure that properly certified AIS equipment tested by an independent facility is available to meet IMO and USCG carriage regulations".² The Coast Guard comment goes on to propose "§80.331 Special requirements for universal shipborne automatic identification systems AIS".

The extensive effort taken by the Coast Guard to include a detailed statement on AIS in its Comments is appreciated. Tideland supports the comments submitted by the Coast Guard and urges strongly the Commission be guided thereby as it proceeds to Rulemaking.

Respectfully submitted,

TIDELAND SIGNAL CORPORATION

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Its Attorney,

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Date: September 21, 2000

¹See Coast Guard pages 33, 34, and 35.

²See Coast Guard comment page 35.